

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH
CAROLINA**

MAXWELL KADEL, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No.: 1:19-cv-272-LCB-LPA
)	
DALE FOLWELL, in his official capacity as)	
State Treasurer of North Carolina, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**JOINT MOTION FOR ENTRY OF STIPULATION TO CORRECT DEFENDANT
NORTH CAROLINA DEPARTMENT OF PUBLIC SAFETY’S ANSWER**

Defendant State of North Carolina Department of Public Safety (“DPS”) and Plaintiffs Maxwell Kadel, Jason Fleck, Connor Thonen-Fleck, Julia McKeown, Michael D. Bunting, Jr., C.B., by his next friends and parents, Michael D. Bunting, Jr. and Shelley K. Bunting, Sam Silvaine, and Dana Caraway (collectively, “Plaintiffs”) desire to enter into this stipulation (Attachment A) to correct DPS’s Answer (ECF No. 96) and clarify DPS’s position as to the allegations in paragraphs fifteen through seventeen and paragraph 178 of Plaintiffs’ Amended Complaint (ECF No. 75). Correcting this error by stipulation will promote clarity between the parties and conserve judicial and party resources by eliminating the need for Defendant DPS to file an Amended Answer.

Respectfully submitted this the 8th day of July, 2021.

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*Appearing by special appearance
pursuant to L.R. 83.1(d).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document was filed through the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

This, the 8th day of July, 2021.

/s/Amy E. Richardson
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